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July 19, 2022

VIA ECF

The Honorable Victor Marrero
United States District Court Judge
United States District Court
500 Pearl Street, Suite 1610
New York, New York 10007

Re: Nwosuocha v. Glover, et al. (Civ. Action No. 21-cv-04047)

Dear Judge Marrero:

We are the attorneys for Defendant Donald McKinley Glover, II in the above referenced action. We submit this letter on behalf of all Defendants, which comprise Defendants Glover, Ludwig Emil Tomas Göransson, Jeffery Lamar Williams, Kobalt Music Publishing America, Inc. d/b/a Songs of Kobalt Music Publishing, Sony Music Entertainment, Young Stoner Life Publishing, LLC, Theory Entertainment LLC d/b/a 300 Entertainment, Atlantic Recording Corporation, Songs of Universal, Inc., and Warner-Tamerlane Publishing Corp.

Reference is made to your Honor's Order, dated June 24, 2022, in which Defendants were granted permission to file a motion to dismiss the Complaint. However, your Honor has allowed defendants "a motion to dismiss which shall not exceed three pages in length (single spaced, twelve-point font), unless, upon a party's request, the Court authorizes a larger number." [Dkt. No. 81 at 2.]

Because Defendants have multiple grounds warranting the dismissal of the Complaint, as enumerated in the initial premotion letter, we respectfully request that the Court permit Defendants (totaling ten parties) the right to file jointly a brief consisting of 6 single-spaced pages. We submit that the additional pages are necessary to fully present the motion. We have made every effort to be concise.

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We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Jonathan D. Davis

Jonathan D. Davis

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cc: All Counsel (Via ECF)